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Workplace Safety & Insurance Board  
200 Front Street West  
Toronto, ON M5V 3J1

Attn: RATE FRAMEWORK CONSULTATION

Dear Rate Framework Committee:

I am a second-generation business owner. For more than 40 years my family has been working hard, building our business and contributing to our community, our employees and our local economy. My father started in the trucking business and over the course of the next two decades expanded into logging and road construction. We have seen the best of times, through the vibrant 1980s, and the worst of times, in 2012 with the closure of our local pulp and paper mill. Because of the volatility in the forest industry, my father knew the importance of diversification. My brother and I joined the company almost two decades ago with the hopes and desires of becoming a third-generation family operation. We have continued to expand our company to include culvert and geotextile sales, warehousing, commercial rentals and road maintenance services; including gravel sales, sanding, grading and dust suppression. Because of this diversification we have been able to survive the economic downturn in our region. We continue to employ 16 full time staff. I tell you our 'story' because I feel the WSIB often forgets who we, the companies, are. We are regular people working extremely long hours to keep food on the tables of our employees, suppliers and ourselves. As you read my letter please remember that you're not just 'doing your job' when you make decisions at work. Your decisions greatly effect families and companies just like mine.

Also, please note that you may not hear very much of a response from small business. Do not construe the lack of communication as agreement with the framework. Most business owners will not reply, even when they completely disagree, because many of them, myself included, do not have the time or resources to navigate the hundreds of pages of complex and convoluted information. The sheer volume and complexity of the framework is overwhelming. The constant updates and deadline extensions make it nearly impossible to stay current on the information. Couldn't there have been a simpler way to address the issues faced by WSIB? Why does the entire process have to take years and years of planning and millions of dollars spent? In my opinion the entire system has become more complicated, left more unanswered questions, and caused more inequity than ever before.

Also, the majority of business owners I have spoken to say "What's the point in responding? They (the WSIB) never listen to us anyways?" On past occasions when I have voiced my concerns to the WSIB, I too have felt unheard. Many small business owners also don't want to 'rock the boat' and are terrified because of stories of "I voiced my opinion and then got an audit." I am now afraid of the same. The last auditor who came to our company had me in tears. She was aggressive, difficult and threatening. Who wants to invite that back in to your office?

Despite my fears of not being heard, or of potential retribution, I believe the WSIB needs to address the following issues more completely.

1. **Lower the Test of Significance:** I highly urge the WSIB to lower the test. Just because the rate group doesn't meet the 25% threshold doesn't mean that it isn't a big part of the company's success. How can we compete with competitors paying just a fraction of the WSIB I would be forced to pay under the higher rate group. It is discriminatory to smaller businesses.
2. **Construction Coverage for Non-Exempt Partners:** This issue has not been addressed.
3. **Forestry Rate Inequity:** There is a serious need to re-evaluate the rates you charge to Forestry. Forestry rates need to be adjusted to reflect the Mechanized Harvesting Equipment Operators of today. We no longer cut with chain saws. Feller bunchers, used to cut the trees, are the same equipment bodies as excavators. So why do we pay 13.35% in the same machine as a construction excavator that pays only 4.5%? The forest industry across Canada has similar working environments and conditions. Yet Alberta, BC and Manitoba pay only a fraction of the compensation (1.71%-2.96%) that we pay in Ontario (13.35%). Is the WSIB that poor at managing their premiums that they need to gouge us in Ontario?
4. **Private Coverage:** I feel that we as business owners' should have the option to leave WSIB and provide private insurance coverage to our employees. My brother and I have policies that far exceed any WSIB coverage and we pay only a fraction of the cost of WSIB.
5. **Actual Rates:** Despite the thousands of pages available online not ONCE are any potential premium rates mentioned.

Maybe instead of spending millions of dollars and thousands of man hours on a terrifyingly complex framework, WSIB should spend it on SIMPLIFYING THE PROCESS. Create a system that is fair. My secretary in the office pays the same rate as my skidder operator, yet their exposures to workplace incidents are entirely different. Also, if you're going to start changing the system maybe you should spend more time discussing the ACTUAL RATES so that business owners know where they stand.

Thank you for the opportunity to share my side of the Rate Framework equation. I apologize if you find my letter too emotional but this affects MY bottom line, MY employees, MY business and MY life. Please consider that when making decisions with my hard earned WSIB premiums that are paying your wages.

Sincerely,



Shanda DeGagne-Begin

CC: Canadian Federation of Independent Business